

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

In Re:

Las Martas, Inc.

Debtor

Case No.: 22-02380 ESL

Chapter 12

TRUSTEE'S REQUEST FOR LEAVE TO FILE POSITION

TO THE HONORABLE COURT:

NOW COMES José R. Carrión, Chapter 12 Standing Trustee, and very respectfully alleges and prays:

1. On June 9, 2025, this Honorable Court held a status conference regarding the present case. During the same it ordered the parties to perform the following tasks:

- (a) For Condado 5, LLC ("Condado") to immediately cease collecting the Debtor's proceeds from the sale of milk;
- (b) For Condado 5, LLC ("Condado") to submit to Las Martas, Inc. (the "Debtor") and the Trustee a detail of all funds received from milk proceeds of the Debtor since the filing of the petition within thirty (30) days;
- (c) For the Debtor and Condado to file a Joint Report on the distribution of the consigned funds within thirty (30) days;
- (d) For Debtor to file a summary of its monthly operations since the dismissal of the case through May 2025 within thirty (30) days and regular monthly operating reports thereafter; and
- (e) For the Debtor to file an amended plan within 30 days.

2. Condado, on June 11, 2025, filed a *Motion for Entry of Order to Stay Any Pending Matter Currently on Appeal Under the Divestiture Rule* (Docket 197, the "Motion for Stay"). In the same, Condado requested under the Divestiture Rule that this Honorable Court refrain from ordering any distribution of funds to the parties, as it may affect the appeal pending in the United States District Court for the District of Puerto Rico, Case No. 23-01074.

3. Shortly thereafter, on June 24, 2025, Condado filed an *Urgent Motion Staying any Redirection, Withholding or Distribution of Milk Sale Proceeds During the Pendency of Condado's Appeal and for Consignment of Proceeds Pending Resolution of the Appeal* (Docket 202, the "Urgent Motion for Stay"), in essence, reiterating the request made in the Motion to Stay.

4. This Honorable Court ordered parties in interest to respond to the Urgent Motion for Stay on or before July 3, 2025 (Docket 205).

5. By error or inadvertence, the Trustee did not submit his position by said deadline. In light of the above, the Trustee hereby requests leave to submit his position as to the Motion for Stay and the Urgent Motion for Stay.

6. Allowing the Trustee to submit his position will not cause prejudice to the parties in this case, as they are still litigating this matter and no decision has been entered by this Honorable Court.

WHEREFORE for the reasons described above, the Trustee respectfully prays for this Honorable Court to grant him leave to file his position regarding the Motion to Stay and the Urgent Motion to Stay.

Certificate of Service

The Chapter 12 Standing Trustee herewith hereby certify that on this same date, we electronically filed the foregoing with the Clerk of the Court using the Next Gen CM/ECF system which will send notification of such filing to all Next Gen CM/ECF participants in this case, including counsels for Debtor, Condado 5, LLC, the U.S. Trustee for Region 21, and all parties requesting notice.

In San Juan, Puerto Rico this **18th** day of July 2025.

JOSE R. CARRION
CHAPTER 12 STANDING TRUSTEE
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By: /s/ José R. Carrión
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/s/ Alexandra Rodriguez Diaz
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